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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
ANU ALLEN,
Plaintiff,
-against-
CHANEL INC.,
Defendants.
-----x

Civil Action No.: 12-cv-6758(RPP)
DECLARATION OF
ANU ALLEN IN OPPOSITION TO
MOTION TO AMEND COUNTER-
CLAIMS AND FOR SANCTIONS

I, ANU ALLEN, declare as follows under penalty of perjury:

1. I am the Plaintiff in the within case.
2. I submit this Declaration to place before the Court certain facts.
3. I admit that I signed the document attached to defendant's motion as Exhibit "B" entitled

"CHANEL, Inc. Policy on Employee Use of Confidential Information.

4. Exhibit A is a true and correct copy of Plaintiffs production bates stamped ("000001" to "000139").

5. There is no dispute I signed the changed version of the "Separation and Release Agreement" attached to defendants motion as Exhibit "D" and that I accepted a check defendants Exhibit "E". However, the check was deposited "with reservation of right" and to the best of my knowledge and belief this check contained unpaid hours and benefits due to me up to the time of my termination from defendant.

6. I do not believe that I am in possession of any of defendants "confidential" and/or "privileged" documents. I am however, in possession of COPIES of documents that were in my

personnel file. I made these copies when, during the ordinary course of working, I became aware of my personal file being left on the copy machine at work, at Chanel.

7. No request has been made of me to return these COPIES of documents.
8. I have not refused to return COPIES of these documents.
9. As the Court can see from the motion papers movant has failed to identify which papers they claim to be "confidential" and/or "privileged".

10. Based on the above and the arguments set forth in the attached memorandum of law filed by my attorney, I respectfully request the case not be further delayed and that movants motion be denied in its entirety.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 10th day of October 2014 in West Islip, New York.

Respectfully Submitted,

By: Anu Allen
ANU ALLEN